## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA V.	) ) )	CR. NO. 15-CR-12-01-SM
PANOS ELIOPOULOS, and KATIE ELIOPOULOS	)	
	) _)	

## DEFENDANT'S ASSENTED TO MOTION TO CONTINUE

The defendant requests that this Court issue an Order continuing the trial from January 20, 2016 for at least 60 days. Grounds follow:

The trial in this case is currently scheduled for January 20, 2016. All counsel of record have trial schedules in January which would not permit them to adequately prepare for and participate in a jury trial in this case during. Undersigned counsel has been informed that both Attorney Charles Keefe, counsel for Panos Eliopoulos, and AUSA Jennifer Davis, that they would be available to conduct the trial in March, 2016.

AUSA Jennifer Davis assents to this motion.

Charles Keefe, counsel for Panos Eliopoulos assents to this motion

The defendant agrees to waive her right to speedy trial with respect to any delay caused by the granting of this motion. A fully executed waiver will be forthcoming under a separate heading.

No memorandum of law is necessary to the resolution of the issues raised herein.

WHEREFORE the defendant requests that this Court issue an Order continuing the trial from January 20, 2016 for at least 60 days.

Respectfully submitted, Katie Eliopoulos By Her Attorney,

Date: December 15, 2015 /s/ Jonathan R. Saxe

Jonathan R. Saxe N.H. Bar No. 8226 Assistant Federal Defender Federal Defender Office 22 Bridge Street Concord, NH 03301 Tel. (603) 226-7360

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## **CERTIFICATE OF SERVICE**

I hereby certify that the above document was served on December 15, 2015 to all counsel of record and in the manner specified herein: electronically served through ECF.

/s/ Jonathan R. Saxe
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